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19 Attorneys for Plaintiff and
Counterdefendant Moog Inc.

20 **UNITED STATES DISTRICT COURT**
21 **CENTRAL DISTRICT OF CALIFORNIA**

22 MOOG INC.,

23 Plaintiff,

24 v.

25 SKYRYSE, INC., ROBERT ALIN
26 PILKINGTON, MISOOK KIM, and
27 DOES NOS.1-50,

28 Defendants.

Case No. 2:22-cv-09094-GW-MAR

Hon. George H. Wu

**DECLARATION OF KAZIM A.
NAQVI IN SUPPORT OF
PLAINTIFF AND COUNTER-
DEFENDANT MOOG INC.'S
NOTICE OF MOTION AND
MOTION FOR LEAVE TO AMEND
TO FILE AMENDED COMPLAINT**

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[Filed concurrently with Notice of Motion and Motion; [Proposed] Order]

Date: June 19, 2023

Time: 8:30 a.m.

Ctrm.: 9-D

Complaint Filed: March 7, 2022

Counterclaims Filed: January 30, 2023

DECLARATION OF KAZIM A. NAQVI

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2 1. KAZIM NAQVI, under penalty of perjury and pursuant to 28 U.S.C.
3 § 1746, declares the following to be true and correct:

4 2. My name is Kazim Naqvi. I am an associate at Sheppard, Mullin,
5 Richter & Hampton LLP. I am over the age of 18 years old. I have personal
6 knowledge of the matters set forth herein and if called as a witness, I could and
7 would competently testify as to all facts set forth herein. I am counsel for plaintiff
8 and counterdefendant Moog Inc. ("Moog") and I provide this declaration in
9 support of Moog's Notice of Motion and Motion to for Leave to File Amended
10 Complaint (the "Motion")

11 3. A true and correct copy of Moog's [Proposed] Amended Complaint is
12 attached hereto as Exhibit 1.

13 4. A true and correct copy of a redline showing the changes in Moog's
14 [Proposed] Amended Complaint compared to its Original Complaint is attached
15 hereto as Exhibit 2.

16 5. On May 19, 2023, in an effort to see if the Parties could agree and
17 stipulate to the filing of the Proposed Amended Complaint, I circulated to counsel
18 for all Defendants a draft of Moog's Proposed Amended Complaint and a redline
19 showing the changes made compared to Moog's Original Complaint.

20 I declare that the foregoing is true and correct under penalty of perjury
21 under the laws of the United States of America.

22 Executed this 22nd day of May, 2023, in Los Angeles, California.

23
24 /s/ Kazim Naqvi

25 Kazim Naqvi
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